

WESMAC

POST OFFICE BOX 1295
VENICE, CA 90294-1295
PHONE: (310) 597-5694
FAX: (310) 591-2433

RECEIVED

NOV 16 1992

November 13, 1992

Office of the Secretary
Federal Communications Commission
Washington, D. C. 20554

RECEIVED

NOV 16 1992

MAIL BRANCH

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
FCC MAIL BRANCH

NOV 16 1992

Dear Sir:

We are pleased to enclose an original and nine copies of our reply comments in the matter of F. O. Docket No. 92-206. Please arrange for each Commissioner to receive a personal copy of these reply comments.

The consensus of original comments appears to be in favor of a limited number of entities being authorized to perform testing for the commercial radio operator licenses. WESMAC supports this position.

Our reply comments will describe the implementation of this concept in a manner which will require minimal control and supervision by the Commission, while providing increased test frequency, while maintaining a high order of examination integrity.

The structure proposed by WESMAC will also provide **fair and uniform testing nationwide**, which cannot be ensured by some of the plans proposed by other prospective entities.

Finally, we note that several of the original comments received by the Commission contain the same ideas which recommend the appointment of three or four examining entities; in some cases, the wording of these comment letters is identical. We trust that the Commission will heavily discount these comments as not being the opinions of the industry at large, but rather the result of a campaign by a relatively narrow interest group, whose objectivity should receive careful scrutiny.

If you require clarification of our comments, please call me at 1-800-WESMAC-1.

Respectfully submitted,



Richard L. Davis, President
WESMAC
/bmg

encls. (10)

No. of Copies rec'd
List A B C D E

0 + 9

2

RECEIVED

NOV 16 1992

MAIL BRANCH

REPLY COMMENTS

RECEIVED

NOV 16 1992

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

FCC MAIL BRANCH

NOV 16 1992

In the Matter of F. O. Docket No. 92-206

November 13, 1992

Submitted by:

**WESMAC
3926 Bledsoe Avenue
Los Angeles, CA 90066
Telephone 1-800-WESMAC-1**

1.0 GENERAL

1.1 In late October, 1992, WESMAC submitted comments to the Commission in the matter of F. O. Docket No. 92-206. We request that our original comments be considered a part of these reply comments by this reference.

1.2 WESMAC maintains its willingness and ability to support any level of privatization described in our original comments, and will entertain other possible privatization structures which the Commission may adopt.

1.3 WESMAC urges the Commission to designate **only one** examining entity in any geographic region, to avoid the confusion which will inevitably result from the appointment of two or more examining entities in the same city, state or geographic region.

1.4 The rest of our reply comments will supply further details of the structure proposed by WESMAC for privatization of the commercial radio operator license examinations, and will demonstrate that this structure will satisfy the Commission's objectives, which include the following features:

1.4.1 Reduction of the Commission's burden of supervision and control.

1.4.2 Maintenance of a high order of examination integrity.

1.4.3 Elimination of conflict-of-interest in the examination process.

1.4.4 Increasing the frequency of examination opportunities.

1.4.5 Increasing the number of examining locations.

2.0 THE ORGANIZATION OF REGIONAL EXAMINING ENTITIES

2.1 WESMAC recommends that the Commission designate a single examining entity in each of approximately seven geographic regions. Each entity will be responsible for all commercial radio operator license examinations in its designated area.

2.2 The Commission should designate **one** of the designated entities as its sole contact for supervision, control and reporting.

2.3 The central examining entity described in Section 2.2 shall have the following responsibilities:

2.3.1 It will serve as the central location for all new or renewal license applications.

2.3.2 It will transmit (by FAX, modem or mail) license applications to the regional examining entities within a reasonable time period after the application deadline.

2.3.3 It will receive (by FAX, modem or mail) examination results from the regional examining entities immediately after each examining period.

2.3.4 It will collate and forward to the Commission all examination results with its recommendation for licensing of the successful applicants.

2.3.5 It will submit any and all required reports to the Commission, with the cooperation of the regional examining entities.

2.3.6 It will disseminate the Commission's orders, directives, bulletins and intent to the regional examining entities.

2.3.7 It will serve as the chief examining entity in matters pertaining to administration of the privatization of commercial license examinations, and will serve as the chair of coordination meetings, whether they be at one location, by teleconferencing or by other means.

2.4 The central examining entity described in Section 2.2 will perform its responsibilities at no cost to the Commission, but will recover its costs of operation by extracting a percentage of all licensing fees, or by being relieved of certain responsibilities which the regional examining entities must perform, or by a combination of these means.

2.5 The regional examining entities described in Section 2.1 shall have the following responsibilities:

2.5.1 Upon receipt of examination applications from the central examining entity, they will notify each applicant of the location, date and time of his or her examination.

2.5.2 They will conduct and score examination at each test site, using the "double blind" method described in Section 3.5 of WESMAC's original reply comments.

2.5.3 They will transmit (by FAX, modem or mail) examination results to the central examining entity within 48 hours of completion of the scheduled examinations.

2.5.4 They will submit all reports and documentation required by the central examining entity in its liaison with the Commission.

2.5.5 They will maintain their assigned test item materials (as described in Section 3) in a current status at all times.

2.5.6 They will distribute (by FAX or modem) their assigned test materials to the other examining entities immediately before each examining period, allowing ample time for reproduction and collating within each test jurisdiction.

2.5.7 They will coordinate their activities with the other examining entities by centralized meetings, teleconferencing or by other means, to ensure fair and uniform examination procedures nationwide.

2.6 The regional examining entities will perform the responsibilities as described in Section 2.5 at no cost to the Commission, but will recover their costs of operation from the licensing fees paid by the license applicants.

2.7 The examining entities will be organized as a committee, using one of the numerous electronics industry examples as a model. In this manner, the entities will establish and maintain uniform and fair examining procedures with minimal control and supervision by the Commission. It is anticipated that organization would require little more than periodic review and approval by the Commission.

3.0 DESIGN OF EXAMINATION MATERIALS

3.1 It will be the responsibility of the examining entities, working collectively, to maintain appropriate test materials for each required examination. WESMAC's original comments described a method by which this can be accomplished in our original comments, and will briefly summarize the method in the following sections.

3.2 By agreement of the examining entities, each examination will be organized according to subject matter, and the number of questions required for each subject will be determined.

3.3 The examination subjects will be divided among the examining entity so that no single entity will be wholly responsible for preparation of any single examination. It is recognized that some entities may have the responsibility of preparing two, or possibly three portions of the longer examinations.

3.4 Each examining entity will be responsible for developing and maintaining pertinent test items (individual questions) in its assigned subject matter.

3.5 Prior to each examination period, each examining entity will transmit several versions of its assigned test materials for each examination to the other examining entities, allowing sufficient time for copying and collating within each jurisdiction.

3.6 At the completion of each examination period, the examination booklets will be destroyed by shredding or other appropriate means.

4.0 FREQUENCY OF LICENSING EXAMINATIONS

4.1 WESMAC proposes that quarterly examinations be implemented upon privatization of the examination process.

4.2 The committee which comprises the regional examining entities may elect to increase the examining frequency to six times a year, if the volume of license applications justifies this.

4.3 As an alternative to examination on demand, WESMAC proposes that provision be made for examinations 90 days after the regularly scheduled examinations, based on a quarterly examination schedule. In the event of scheduling examinations six times a year, applicants should be offered examination opportunities 30 days after the regularly scheduled examinations.

4.4 The administration of off-schedule examinations will necessarily increase administrative costs, and these examinations should be given only in the event of compelling need. A larger examination fee for off-schedule examinations is also appropriate.

5.0 EXAMINATION SITE LOCATIONS

5.1 WESMAC recommends that the current 25 test sites be maintained in the event of privatization, and approximately the same number of new test sites be established.

5.2 From time to time, it is anticipated that one or more regional examining entity may determine that the number and location of test sites within its jurisdiction is inappropriate for the best combination of test opportunity and cost containment. In this event, the regional examining entity will petition the Commission (through the central examining entity) for permission to adjust the number of test sites in its jurisdiction.

6.0 SUMMARY

5.1 WESMAC reasserts its support of the Commission's inquiry regarding privatization of the commercial radio operator's licensing examination process. We are prepared to participate in this program to the extent deemed appropriate by the Commission.

5.2 We believe that the Commission's objectives are best served by the designation of regional jurisdictions, containing a single examining entity.

5.3 We believe that the examination materials for **all** examinations be prepared and shared by the regional examining entities, as described herein.

5.4 We are opposed to the concept of annual renewal examinations as being too restrictive for the licensed operators, and also because it would sharply increase the burdens of administration and certification, in addition to the increased cost to the operators.

5.5 We hope that our remarks in these reply comments and our previous comments have been helpful to the Commission, and request that we be given an opportunity to participate in future discussions related to privatization.